

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

Clarence B. Jenkins Jr.)
)
 Plaintiff) Case No.)
)
 v.)
)
 Office of South Carolina Governor, South)
)
 Department of Employment Workforce,)
)
 South Carolina Department of Administration,)
)
 South Carolina Human Affairs Commission,)
)
 South Carolina Department of Public Safety,)
)
 South Carolina Office of Inspector General,)
)
 South Carolina Secretary of State Office and)
)
 Richland County Government.)
)
 Defendants,)
)

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I as Pro Se Plaintiff bring this lawsuit against these Defendants for Discrimination, Employment Discrimination, Retaliation, Violation of State Laws, Violation of Federal Laws and a Consolidated Efforts that conspired to deny justice. The violations by all Defendants are established by Title VII of the Civil Rights Act of 1964, American Disability Act of 1990,

Deprivation Act Section 242 of Title 18 and Fourteenth(14th) Amendment of U.S. Constitution.

I as Pro Se Plaintiff does not bring this Litigation against any Defendants under Section 1983 42 U. S. C.

I as Pro Se Plaintiff bring this lawsuit against ALL Defendants per Charge No. 436-2025-00781 filed with U.S. Equal Employment Opportunities(hereafter USEEOC). The USEEOC issued a Dismissal with a Right To Sue Notice on June 30, 2025 stating a lawsuit must be file in U.S. Federal Court within ninety days(90) therefore lawsuit is proper before this COURT. Also I as Pro Se Plaintiff brings this lawsuit against ALL Defendants because of as Admission of December 21, 2023 in U.S. District Court, Columbia Division that actions was taking to deny employment opportunities. And the Admission by Defendants on December 21, 2023 in U.S. District Court. Columbia Division acknowledged the harm regarding the illegal actions of denying employment opportunities. I as Pro Se Plaintiff has worked for South Carolina Department of Employment Workforce(hereafter SCDEW) from 2002 to 2005 therefore established a relationship through employment. All Defendants has Retaliated against I as Pro Se Plaintiff because of Charges of Employment Discriminations along with Charges of Retaliation filed with the U.S. Equal Employment Opportunity Commission(hereafter USEEOC) and South Carolina Human Affairs Commission(hereafter SCHAC). I as Pro Se Plaintiff has substantial records of Discrimination, Violation of Federal Laws and State Laws by all Defendants.

It is my right to bring a lawsuit because of harm against any individual(s) or agencies as afforded by the US. Constitution as a redress. I as Pro Se Plaintiff does not need to filed a

Charge of Employment Discrimination with USEEOC to bring a lawsuit against an employer or individual(s). I as Pro Se Plaintiff does not need to have a Notice of Right To Sue from USEEOC before filing a lawsuit against Defendants. And because All Defendants has violated Federal and State Laws in a Consolidated Efforts to deny justice that is based on substantial evidence. And Pro Se Plaintiff's lawsuit against Defendants is proper before this COURT.

Judge Paige J. Gossett, U.S. District Judge Terry L. Wooten and Judge Jacquelyn D. Austin of U.S. District Court Columbia Division has performed Egregious Judicial Misconduct against Pro Se Plaintiff regarding several lawsuits brought before them over many years therefore a Judicial Relief is being requested from these judges. All has ignored and denied substantial documented evidence in several cases to deny justice. Also has performed Judicial Misconduct by Ruling in my favor only to dismiss pertinent evidence and facts by given Defendants a favorable decision of an ORDER Of DISMISSAL. The substantial evidence against All are verified by an extensive court's records maintained at U.S. District Court, Columbia Division, U.S. Fourth Circuit Court of Appeals and Supreme Court of United States. And Judge Paige J. Gossett, Judge Terry L. Wooten and Judge Jacquelyn D. Austin has been provided evidence by email communications from I as Pro Se Plaintiff of their Egregious Judicial Misconduct that is of criminal conduct. And based on substantial evidence of crimes as records at the U.S. District Court, Columbia Division, U.S. Fourth Circuit Court of Appeals in Richmond, VA and beyond therefore I as Pro Se Plaintiff is seeking a relief from these CORRUPT JUDGES as mentioned.

I as Pro Se Plaintiff brings this case against all Defendants after exhausting Administrative

Procedures with USEEOC per Charge No. 436-2025-00781 upon receiving a Dismissal and Notice of Right to Sue on June 30, 2025 therefore must file Litigation in Federal Court within ninety days(90). It is not a requirement to have a Dismissal and Notice of Right to Sue from USEEOC to bring a lawsuit for Civil Rights Violations against any employer even though this Litigation is filed per Charge 436-2025-00781 of USEEOC.

The evidence against Defendants is substantial and pertinent to establish Title VII of the Civil Rights Act of 1964, American Disability Act of 1990, Deprivation Act Section 242 of Title 18 and Fourteenth(14th) Amendment of U.S. Constitution.

The Admission by Defendants of deliberately taking actions to deny employment opportunities in U.S. District Court, Columbia Division on December 21, 2023 was a violation of Federal and State Laws. And that Admission on December 21, 2023 by Defendants of denying employment opportunities has done harm which was acknowledged at #11 in the court's filing. The deliberate actions of denying employment opportunities by Defendants has done irreparable harm.

I as Pro Se Plaintiff has submitted substantial evidence of being placed on automatic rejection when seeking employment by rejections emails up to fifteen(15) in one day. The first ten rejections emails came within one hour(60 minutes) and that last five(5) after 5pm to 10pm when SCDEW is closed. I as Pro Se Plaintiff was denied an employment opportunities with S.C. Judicial Court System as stated by Sharlayne Bellamy in 2013 when she received notification from the State of South Carolina about me to say "Barred from Applying". Samuel Wilkins of

South Carolina Budget and Control(S.C. Department of Administration) on July 24, 2013 stated that SCDEW made the notation in their system to say I as Pro Se Plaintiff was "Bared From Applying". Koa Morgan of SCDEW stated on July 25, 2013 fraudulently stated on July 25, 2013 that notification had been received informing them of "Barred from Applying". SCDEW intentionally applied "Barred from Applying on July 19, 2013 to December 30, 2018 to deny employment opportunities so the response from Koa Morgan on July 25, 2013 was an INTENTIONAL LIE to deceive and cover up Civil Rights Violations. I received a packet of documents from Brian Gaines of S.C. Department of Administration on April 6, 2015 which included inner-office communications regarding I as Pro Se Plaintiff being "Barred from Applying". I discovered within those documents received on April 6, 2015 an INTENTIONAL ACT TO HARM and a CONSOLIDATED EFFORTS by many individuals and agency to Cover up Civil Rights Violations of Employment Discrimination and Retaliation. The documented records showed that

Adrienne Sorenson of SCDEW HR Office applied an illegal bar of "Barred from Applying" on July 19, 2013 to December 30, 2018 an intentional act of harm to deny employment opportunities. The intentional bad acts of applying "Barred from Applying" was for an estimated six years(6) of denying employment therefore Deprivation and Poverty having the inability to work or earn an income therefore a struggle sustaining life. I as Pro Se Plaintiff as a Colored Man or African American

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Man was denied basic rights afforded to every person guaranteed by the U.S. Constitution. The inner-office communications received on April 6, 2015 from Brian Gaines showed many individual(s) and agencies knew about an illegal bar of "Barred from Applying" therefore made a deliberate efforts of presenting distortions as a cover up and deny Civil Rights Violations of Title VII of the Civil Rights Act of 1964. SCDEW and South Carolina State Government Agencies has falsely stated in writing to I as Pro Se Plaintiff that "Barred from Applying was a system error which was a deliberately distortion. SCDEW and South Carolina State Government Agencies knew that stating "Barred from Applying" was a system error as an intentional and elaborate scheme to deny and cover up Civil Rights Violations.

Because of deliberate distortions by SCDEW and South Carolina State Government Agencies to cover up and deny Civil Rights Violations of an illegal bar with "Barred from Applying" a SECRET BLACKBALLING AFFECT therefore contacted NEOGOV the software provider on May 22, 2019. I as Pro Se Plaintiff received email communications from NEOGOV on May 23, 2019 to August 12, 2019 stating "Barred from Applying is a feature of the product and not a system error. NEOGOV stated by email communication that "Barred from Applying" is applied by the Users of their product which would be SCDEW. NEOGOV also stated the bar of "Barred from Applying" is used to flagged an applicant. NEOGOV has stated by email communications that it does not have any involvement in how the Users used

their product. And SCDEW use this computer software from NEOGOV to apply another false and illegal classification of NEPOTISM to deny employment opportunities as early as 2011 based on documented evidence of Applicant Master Profile.

I as Pro Se Plaintiff received an email from Kelly Coakley of S.C. Department of Administration documented evidence regarding NEPOTISM on Janauary 28, 2021. It is unlawful for anyone in the State of South Carolina to be involved in NEPOTISM. The false application of NEPOTISM applied to Applicant Master Profile by SCDEW prevented employment opportunities. The false application of NEPOTISM to my Applicant Master Profile by SCDEW HR Office was a deliberate act to harm because of knowing it was unlawful to do so.

I as Pro Se Plaintiff because of my direct professional excellent work experience with SCDEW received an email communication on October 27, 2022 as invitation to apply for a WORKFORCE SPECIALIST POSITION at Orangeburg SC Ready Work Center on November 2, 2022. The invitation stated to bring updated resume and come dress for an interview. I as Pro Se Plaintiff went to Orangeburg SC Ready Work Center on November 2, 2022 with resume and prepared to be interview. I as Pro Se Plaintiff with direct professional excellent work experience did not received an interview per the stated invitation from SCDEW. I did not received

any follow up from SCDEW after several months of applying for a Workforce Specialist Position. I went to Orangeburg SC Ready Work Center on March 28, 2023 seeking to speak with Tomeka Johnson who was the director but she was not there. I spoke with a white gentleman who was a supervisor which provided the phone number for Tomeka Johnson. I called Tomeka Johnson on March 28, 2023 leaving her message regarding concerns of receiving an interview as stated in the job announcement from SCDEW.

I received a phone call from Tomeka Johnson on March 29, 2023 regarding application and interview process. I explained to Tomeka Johnson my direct professional work experience with SCDEW and excellent work performance. Tomeka Johnson stated that she has nor received or seen my resume which was provided on November 2, 2022. Tomeka Johnson stated that all applications and resumes go to SCDEW HR Office in Columbia which selects the candidates for interviews and send her the list. And those are the candidates that she will interview based on SCDEW HR Office. I explained my situation of being secretly blackball with "Barred from Applying" in the past by SCDEW which may have been the reason why my resume was not provided to her because of still being blackballed. Tomeka Johnson and I spoke for an estimated thirteen minutes (13) which was documented by cell phone. I as Pro Se Plaintiff based on my direct work experience as Assistant Director at Voorhees One Stop Career Center in Denmark, SC as part of SCDEW with an

excellent work performance records should have least receive an interview. I as Pro Se Plaintiff stated to Tomeka Johnson that SCDEW was still blackballing by denying employment opportunity with "Barred From Applying".

The Defendants in Case No. 3:23-CV-4593-JDA-PJG had admitted by an ADMISSION on December 21, 2023 at No. #10 in U.S. District Court, Columbia Division that it take actions to deny employment opportunities. Defendants has been providing deliberate distortions since 2011 that it did not take any actions to deny employment opportunities when substantial evidence has been presented to verify illegal activities. I as Pro Se Plaintiff has provided Defendants and Courts substantial evidence of Civil Rights Violations of Employment Discrimination along with Retaliation which has been willfully ignored to deny justice. The ADMISSION by Defendants on December 21, 2023 was verification of deception since 2011 to escape accountability of Civil Rights Violations. The ADMISSION by Defendants on December 21, 2023 verifies the secret blackballing of "Barred from Applying" to deny employment opportunities which they have DENIED. And Defendants knew the harm at No #11 as part their ADMISSION on December 21, 2023 by denying employment opportunities.

I as Pro Se Plaintiff filed a Charge No. 436-2025-00781 with U.S. Equal Employment Opportunity Commission based on the ADMISSION by Defendants on

December 21, 2023 of taking actions to deny employment opportunities in U.S. District Court, Columbia Division. Also the known harm by the Defendants taking actions to deny employment opportunities at #11 .

I as Pro Se Plaintiff brings this lawsuit against Defendants per U.S. Equal Employment Opportunity Commission Charge No. 436-2025-00781 as stated with Notice of Right to Sue on June 30, 2025. And by U.S. Equal Employment Opportunity Commission issuing a dismissal with a Notice of Right to Sue states that a lawsuit must be file within ninety days(90) in U.S. Federal Court per their instructions. I as Pro Se Plaintiff has exhausted all Administrative Procedures with U.S. Equal Employment Opportunity Commission on June 30, 2025.

I as Pro Se Plaintiff does not need to a Charge filed with U.S. Equal Employment Opportunity Commission to bring a lawsuit in U.S. Federal Court against Defendants according to U.S. Federal Law.

And this lawsuit against Defendants is based on Charge No. 436-2025-00781 filed with U.S. Equal Employment Opportunity Commission that received a dismissal with a Notice of Right to Sue on June 30, 2025.

WHEREFORE, I as Pro Se Plaintiff request this COURT receive this lawsuit to be proper and a requested jury trial. Please see attachments as verification of Charge No. 436-2025-0781 and Court's filings of December 21, 2023.

July 14, 2025


Clarence B. Jenkins Jr.

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